

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TALENTHUB WORLDWIDE, INC.

Plaintiff,

-against-

TALENTHUB WORKFORCE, INC.; ERIC
GOLDSTEIN; STANDARD CONSULTING,
INC.; DIANE POREMBSKI; PATRICIA
KAMPEL; TANYA WILSON (WELLARD);
JEANNINE TRIOLO; VALERIE WEST;
JOSEPH LIPINSKI; and J COMPUTER PRO,
INC.

Defendants.

Case No. 24 Civ. 6264 (LGS)

Hon. Lorna G. Schofield

**NOTICE OF MOTION TO
DISMISS FIRST AMENDED
COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Kenneth W. Taber, dated January 10, 2025, and all exhibits attached thereto, Defendants Talenthub Workforce, Inc., Eric Goldstein, Standard Consulting, Inc., Diane Porembski, Patricia Kampel, Tanya Wilson (Wellard), Jeannine Triolo, Valerie West, Joseph Lipinski, and J Computer Pro, Inc., will move this Court, before the Honorable Lorna G. Schofield, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, for an order pursuant to Fed. R. Civ. P. 12(b)(2) and (6) dismissing the First Amended Complaint, filed on November 8, 2024 (Dkt. 41), by Plaintiff Talenthub Worldwide, Inc., for failure to state a cause of action upon which relief can be granted and for lack of subject-matter jurisdiction.

Dated: January 10, 2025

**PILLSBURY WINTHROP SHAW
PITTMAN LLP**

By: /s/ Kenneth W. Taber
Kenneth W. Taber
Brian L. Beckerman
31 West 52nd Street
New York, NY 10019-6131
Tel: (212) 858-1000
Fax: (212) 858-1500
kenneth.taber@pillsburylaw.com
brian.beckerman@pillsburylaw.com

*Attorneys for Defendants Talenthub
Workforce, Inc., Eric Goldstein, Standard
Consulting, Inc., Diane Porembski, Patricia
Kampel, Tanya Wilson (Wellard), Jeannine
Triolo, Valerie West, Joseph Lipinski and J
Computer Pro, Inc.*